

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Marlow Jones

Case: 2:25-mj-30475

Assigned To : Unassigned

Assign. Date : 7/24/2025

Description: CMP USA v Jones (SH)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 23, 2025 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in possession of a firearm

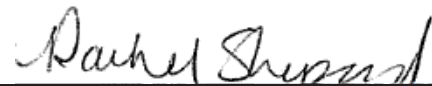
This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: July 24, 2025

City and state: Detroit, MI



*Complainant's signature*

Rachel Shepard, Special Agent

*Printed name and title*



*Judge's signature*

Hon. Anthony P. Patti, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Rachel M. Shepard, being duly sworn, depose and state as follows:

**Introduction and Agent Background**

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since January 2016, and an employee of the FBI for over 15 years. I am assigned to the FBI Violent Crime Task Force (VCTF) located in Detroit, Michigan. Prior to becoming a Special Agent, I worked for the FBI as a Staff Operations Specialist for six years. As a Federal Agent, I am authorized to investigate violations of law of the United States and to execute warrants issued under the authority of the United States.

2. The information contained in this affidavit is based on my personal knowledge and observations during this investigation, law enforcement reports that I have reviewed, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

3. I have not set forth every fact resulting from the investigation; rather, I have set forth a summary of the investigation only to establish that MARLOW DAMONE JONES II is a convicted felon in possession of a firearm, in violation of 18 U.S.C. § 922(g).

### **Investigation and Probable Cause**

4. On Wednesday, July 23, 2025, at approximately 3:53PM, officers of the Detroit Police Department observed MARLOW DAMONE JONES II and another male standing in the street impeding traffic near 12292 Cheyenne Street, Detroit, Michigan. Both individuals were standing near the driver's side of a gray Ram 1500 truck.
5. As officers approached in their vehicle, they observed JONES look in the direction of the patrol vehicle, grab the right-side pocket of his shorts, and run around to the rear of the passenger side of the parked Ram truck. Officers exited their patrol vehicle and heard what was later discovered to be a firearm sliding on the pavement. JONES was also observed bending over toward the ground when he was by the truck. Due to their training and experience, officers believed that JONES was discarding some kind of contraband.
6. Officer Collin Maciejewski ran to the passenger side of the Ram truck where JONES had gone. Officer Maciejewski observed JONES near the truck and saw a firearm under the truck.
7. Officer Dylan Kennedy maintained visual contact with JONES and detained and handcuffed him. Officer Kennedy also observed the keys to the Ram truck on the ground on the passenger side of the vehicle in the path of travel JONES was observed taking. A check of LEIN showed the Ram to be reported as stolen.

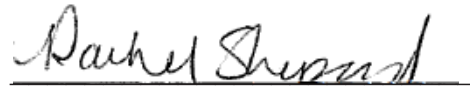
8. Officer Michael Ayola retrieved the pistol from under the parked Ram truck. The firearm was a Springfield Armory XDS .40 caliber handgun with a loaded magazine containing multiple rounds of ammunition and one in the chamber. The handgun had scratch marks on it, consistent with having slid on the pavement.

9. The serial number of the firearm is AT219463. Per LEIN, the firearm was reported stolen to the Detroit Police Department on September 16, 2021.

10. A review of JONES's criminal history revealed numerous entries and included state felony convictions for attempted Home Invasion and Felony Firearm, and federal convictions for Brandishing a Firearm During and in Relation to a Crime of Violence and Carjacking. For his federal convictions, JONES received a sentence of 84 months' on the Brandishing conviction and 60 months' on the Carjacking conviction, consecutive. Additionally, JONES is currently on Federal Probation.

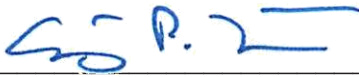
11. Bureau of Alcohol, Tobacco, and Firearms (ATF) Special Agent Michael Jacobs, whom is an interstate nexus firearm examiner, confirmed that Springfield has never been licensed to manufacture firearms within the State of Michigan, therefore the firearm possessed by JONES had to travel in and affect interstate commerce prior to his possession of it.

12. Based on the information provided above, there is probable cause to conclude that MARLOW DAMONE JONES II violated 18 U.S.C. §922(g) (felon in possession of a firearm).

A handwritten signature in black ink, appearing to read "Rachel Shepard", written over a horizontal line.

Rachel M. Shepard  
Special Agent, FBI

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "A. P. Patti", written over a horizontal line.

Hon. Anthony P. Patti  
United States Magistrate Judge

Dated: July 24, 2025